

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                                    |   |                                     |
|------------------------------------|---|-------------------------------------|
| SONRAI SYSTEMS, LLC,               | ) |                                     |
|                                    | ) |                                     |
| Plaintiff,                         | ) | Case No. 1:21-CV-02575              |
|                                    | ) |                                     |
| v.                                 | ) | <b>JURY TRIAL DEMANDED</b>          |
|                                    | ) |                                     |
| WASTE CONNECTIONS OF CANADA, INC., | ) | Honorable John Robert Blakey        |
|                                    | ) |                                     |
| Defendant.                         | ) | Magistrate Judge Sheila M. Finnegan |

**JOINT STATUS REPORT**

In accordance with the Court’s September 5, 2024 Order, (Dkt. 140), Sonrai Systems, LLC (“Sonrai” or “Plaintiff”) and Waste Connections of Canada Inc. (“WCC” or “Defendant”) submit the following Joint Status Report, including each party’s “respective positions on the fact discovery deadline and supporting reasons.” (Dkt. 140).

**I. Sonrai’s Position**

1. The parties previously submitted Joint Status Report on August 29, 2024. (Dkt. 139.) In the Report, the parties reported that they “agreed to exchange by August 30, 2024, hit counts for all search terms that the parties previously exchanged. The parties also agreed to exchange by September 9, 2024 any modified and/or additional search terms for the other party to apply to their documents. The parties agreed to discuss a document review protocol and propose deadlines after these exchanges.” Accordingly, the parties exchanged hit counts on August 30 and amended and additional search terms on September 9, 2024.

2. On September 13, 2024, Sonrai provided the search hits for the terms exchanged on September 9 as well as additional information requested by WCC. Sonrai provided hit reports for all of the search strings requested by WCC, which amounts to 18 search strings in total. During

a meet and confer conference on September 17, 2024, Sonrai agreed to provide responsive, non-privileged documents in response to 15 of the 18 searches. Sonrai also agreed to provide WCC with additional detail regarding issues flagged during the meet and confer conference, including burden and proportionality issues with respect to the remaining 3 searches. Sonrai anticipates providing this information to WCC no later than Tuesday, September 24, 2024.

3. Sonrai provided its modified and/or additional search terms to WCC on September 9, 2024. On September 20, 2024, WCC provided search hit counts for the searches proposed by Sonrai. Sonrai is reviewing them and will schedule a meet and confer with WCC about the search terms this week.

4. Sonrai anticipates that further negotiations will need to take place between the parties about (a) Sonrai's burden and proportionality issues with respect to the remaining 3 searches; (b) WCC's search hits for the terms proposed by Sonrai; and (c) any other modifications and/or additional search terms proposed by either party.

5. Therefore, Sonrai proposes the following fact discovery deadlines:

a. **October 7:** The deadline for the parties to agree upon search terms and custodians.

b. **November 20:** The deadline for substantial completion of document productions, assuming that there is no request for court intervention regarding the parties' proposed search terms or custodians. Sonrai requests this deadline so that the parties have adequate time to review and produce responsive, non-privileged documents resulting from the parties' exchange of search terms.

c. **December 20:** The deadline by which the parties must identify document production deficiencies, if any. Sonrai requests this deadline so that the parties may resolve any outstanding discovery issues prior to or concurrently with the taking of depositions in this case.

d. **February 28:** The deadline by which the parties must complete fact discovery.

6. Sonrai also requests a court status date in or around mid-December 2024 for the parties to provide an update to the court about the status of discovery and any discovery issues that remain outstanding.

7. Sonrai consents to WCC's proposed deadlines for Sonrai to identify records under Rule 33(d) and the exchange of privilege logs (December 15, 2024).

## **II. Waste Connections' Position**

8. The parties exchanged hit counts for all search terms the parties previously exchanged and provided modified search terms for the other party to apply to their documents. The parties also exchanged hit counts for the other party's most recent proposed search terms.

9. The parties met and conferred on September 17, 2024 and September 20, 2024. The parties are continuing to confer about issues related to custodians, search terms, and the attorney's fees WCC is entitled to, including:

- a. Whether Sonrai collected and will produce data from all of their proposed custodians' email accounts, including their email accounts at Sonrai's "affiliated company" (ECF No. 54 ¶ 15) Advanced Custom Engineered Systems & Equipment Co.
- b. Sonrai's proposed search terms, which hit on at least 78,690 WCC documents (including families).

- c. The attorney's fees Sonrai is required to pay WCC pursuant to this Court's September 5, 2024 Order (ECF No. 140). WCC provided its cost request on September 12, 2024, and Sonrai's counsel countered on September 18, 2024. We conferred on September 20, 2024, and WCC provided a counteroffer as a compromise and for settlement purposes only on September 23, 2024. Sonrai will respond by September 25, 2024. If the parties cannot come to an agreement, WCC will file its fee petition by October 2, 2024.

10. WCC consents to Sonrai's proposed deadlines for the parties to agree on search terms (October 7, 2024); substantial completion of document production (November 20, 2024); and completion of fact discovery (February 28, 2025).

11. WCC does not agree to Sonrai's proposed deadline for the parties to identify document production deficiencies. WCC agrees that the parties should raise document production deficiencies promptly but WCC should not be precluded from raising production deficiencies it discovers during depositions.

12. WCC consents to Sonrai's request for a court status date in or around mid-December 2024.

13. WCC proposes the following additional deadlines:

- a. **December 15, 2024:** Deadline for Sonrai to identify records under Rule 33(d) as it agreed with respect to its responses to WCC's interrogatories 1, 2, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, and 18 and specify which business records correspond to each interrogatory answer and to each alleged trade secret.
- b. **December 15, 2024:** deadline for parties to exchange privilege logs.

- c. WCC requests these additional deadlines so it has sufficient time to review the information Sonrai provides and address any deficiencies before depositions are completed.

Dated: September 23, 2024

/s/ J. Scott Humphrey

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*Attorneys for Defendant  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on September 23, 2024, he served a copy of the foregoing on all counsel of record via electronic case filing procedures.

/s/ J. Scott Humphrey  
*One of the Attorneys for Plaintiff*